

Exhibit 3

Reid P. Mullen

From: Simpson, Lisa T. <lsimpson@orrick.com>
Sent: Tuesday, November 10, 2015 8:36 PM
To: Beth Egan; Oracle/Google-OHS Only
Cc: DALVIK-KVN
Subject: RE: Meet and confer follow up| pre-June 2011 custodian issue

Beth and team –

As we discussed at today's meet and confer, here is our proposal with respect to supplementation and pre-2011 discovery:

1. Pre-2011 custodial searching:
 - a. As you have indicated that Google only has documents from 4 of the custodians that we have requested, we ask that you run the proposed search across all four of those custodians: DeCastro, Gil, Chau and Harik.
 - b. We agree with your proposal as to the search terms, that is, running the list we provided, without the first term, and with the new search term we proposed as modified by Google; however, we would like the search logic to be a bit more inclusive and suggest the following: "(wireless or mobile) /25 (strateg* or plan or Android)"
 - c. We do not agree that Google should limit the time frame for searching any of these custodians and ask that Google run the search across those four custodians for all docs pre-2011 (not just 2004-05 as you proposed for Chau and Harik)
2. Pre-2011 non-custodial searching: As we discussed today, we have issued a few RFPs that request information from pre-2011, and we are not prepared to give up those requests in order to agree to the last paragraph of Google's proposal in your October 23rd letter. These are largely non-custodial documents that should be easily collected and produced. These include:
 - a. Metrics – RFPs 303, 304, 305, 306, 307, 308, 309, 310 and 311
 - b. Financials – RFPs 302, 312, 313, 317 and 320
3. Interrogatories: We agree to the "no surprises" proposal that we have been discussing, as articulated in detail in my email of November 2 – basically, the parties agree in responding to interrogatories to identify all new categories of information both from the new time period and from the old time period if it was not disclosed before.
4. With respect to the final paragraph of the proposal in your October 23 letter, if the above categories of information and documents are produced, we will not seek additional supplementation from the pre-2011 time period with three important caveats:
 - a. Depositions – we maintain our agree to disagree position on what can be done at a deposition
 - b. Good faith/Rule 37 exception – we are not precluded from identifying a specific document or piece of information that comes to light that clearly should have been produced the first time, and the parties agree to meet and confer in good faith on such issues
 - c. Privilege Log – we may move on the previously produced privilege logs

Please let us know if Google will agree to this proposal.

Thanks,
Lisa

From: Beth Egan [mailto:BEgan@kvn.com]
Sent: Friday, November 06, 2015 8:30 PM
To: Simpson, Lisa T.; Oracle/Google-OHS Only

Cc: DALVIK-KVN

Subject: RE: Meet and confer follow up| pre-June 2011 custodian issue

Yes that is correct. Thanks, and have a good weekend.

From: Simpson, Lisa T. [<mailto:lsimpson@orrick.com>]

Sent: Friday, November 06, 2015 5:47 PM

To: Beth Egan; Oracle/Google-OHS Only

Cc: DALVIK-KVN

Subject: Re: Meet and confer follow up| pre-June 2011 custodian issue

Thanks Beth. Is it fair to assume from the below that Google does have data for Gil and DeCastro? We had specifically asked about Gil as well on our meet and confer.

Thanks.

From: Beth Egan [<mailto:BEgan@kvn.com>]

Sent: Friday, November 06, 2015 06:35 PM Central Standard Time

To: Simpson, Lisa T.; Oracle/Google-OHS Only

Cc: DALVIK-KVN <DALVIK-KVN@kvn.com>

Subject: Meet and confer follow up| pre-June 2011 custodian issue

Lisa,

I write to follow up on our discussion yesterday with regard to the compromise we offered in my October 23, 2015 letter regarding Oracle's request that Google search six custodians (Henrique de Castro, Georges Harik, Stephen Chau, Salman Ullah, Elad Gil, and Sean Dempsey). In your November 4, 2015 email, you further requested that Greg Stein be added as a pre-June 2011 custodian.

As discussed yesterday, Google is willing to modify its proposed compromise and use the following modified search term rather than Oracle's proposed last search term: "(wireless or mobile) /10 (strateg* or plan or Android)." Using this term with a "/10" rather than Oracle's proposed last term with "and" will reduce the hits by approximately 19%. Further, in response to your question with regard to whether there is custodial data available for the 4 custodians (Georges Harik, Stephen Chau, Salman Ullah and Sean Dempsey), after a further investigation, we have determined there is very little custodial data for Messrs. Dempsey, Ullah, and Stein, as these employees ceased working at Google well prior to the litigation being filed.

We ask that you respond to us by close of business Monday with regard to whether you will accept our compromise as set forth in my October 23, 2015 letter with the above-modified search term replacing Oracle's proposed additional term, and by selecting either Chau or Harik as Oracle's selected custodian for the 2004-2005 time period. We note that we agreed to modify the last paragraph of our proposal to carve out the privilege log issue should Oracle decide to move on that issue.

With regard to other issues addressed on our meet and confer call, we are working to respond to your team on those issues as well.

Beth

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